USDA Child Nutrition Programs Administrative Review Summary Report

School Food Authority: St. John's Lutheran School Agency Code: 147521

School(s) Reviewed: St. John's Lutheran School

Review Date(s): February 21, 2019 Date of Exit Conference: February 21, 2019

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

• Determine whether the SFA meets program regulations,

- Provide technical assistance,
- Secure needed corrective action.
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, meal benefit determination process, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage (dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented
 Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by
 completing training in nutrition, program administration and operations, or communications and
 marketing. For more information go to the Wisconsin DPI <u>School Nutrition Training</u> webpage
 (dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).
- The US Department of Agriculture (USDA) has a toolkit of resources to assist schools in meeting the nutrition standards on their <u>Healthier School Day: The School Day Just Got Healthier</u> webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (http://www.fns.USDA.gov/healthierschoolday).
- The Smarter Lunchrooms Movement encourages schools to implement low-cost and no-cost lunchroom solutions to help students select healthier meal options (http://smarterlunchrooms.org). Smarter Lunchroom techniques are easy to begin implementing and help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and research-based. Consider trying the Smarter Lunchroom techniques for increasing consumption of white milk.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at St. John's Lutheran School for the courtesies extended to us during the on-site review and for being available to answer questions and provide additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

The DPI review team appreciates the willingness of the staff to make changes to meet school nutrition program regulations. It was obvious the staff at St. John's cares for the well-being of their students. They served a great meal, always with a smile, and have a great relationship with the students. We especially enjoyed the fun marketing and we were impressed with the quality of the meal. Awesome job and thank you for what you do for kids!

The DPI review team feel confident that St. John's Lutheran School will continue to improve their knowledge and operation of child nutrition programs.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Certification and Benefit Issuance

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Eleven (11) eligibility determinations were reviewed, zero (0) errors were identified. Great job annualizing the income on applications and running DC reports within the required timeframes.

<u>Limited English Proficiency (LEP)</u>

- Application materials and other communications with households concerning eligibility
 determinations must be provided in a language that parents or guardians can understand in order to
 diminish any language barriers to participation for individuals with limited English proficiency.
- To assist SFAs in reaching households with limited English proficiency, the SNT provides the Wisconsinized version of the USDA Free and Reduced Price Meal application materials in English, Spanish, and Hmong.
- The USDA Food and Nutrition Service (FNS) website offers many other <u>foreign language translations</u> of the Application for Free and Reduced Price School Meals (https://www.fns.usda.gov/school-meals/translated-applications).

Disclosure

- The information provided by the family on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits.
- The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct certification for non-program purposes, such as athletic or testing fee waivers, registration fee waiver, school fees, etc. Consent must be obtained each school year. Find the <u>Sharing Information with Other Programs</u> template on the Free and Reduced Meal Applications and Eligibility webpage (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-infoother-programs.doc).
- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template <u>Disclosure of Free and Reduced Price Information</u> form is located on the

SNT website (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx).

Meal Counting and Claiming

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- The meal counting and claim for the Review Month was conducted perfectly.
- Meals must be offered to all students each day school is in session a full day, so DPI has created <u>Field</u>
 <u>Trip meal resources</u> to help schools offer student meals (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning).

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the food service director and school personnel of St. John's Lutheran School. We appreciate your time and efforts spent preparing for and participating in the onsite review. The food quality was outstanding! The food service director batch cooks and hot holds food items for a short amount of time to preserve freshness. The kitchen is neat and tidy. The food service director submitted thorough meal pattern compliance documentation, and she answered the Public Health Nutritionist's (PHN) questions openly and honestly. She addressed students by name and ensured everyone left the meal service line with a warm and nutritious meal.

<u>Technical Assistance and Program Requirement Reminders</u>

Production Records

Production records are required to document that food meeting the meal pattern was served in the appropriate serving sizes. Continue to record planned usage (e.g. planned # of servings, total planned quantity [in purchase units]) actual usage (actual number of servings prepared), and leftovers for all menu items. Thorough, accurate production records aid with forecasting, ordering, menu planning, and reducing food waste.

Standardized Recipes

A standardized recipe is defined as one that has been tried, tested, evaluated, and adapted for use by your food service. It produces a consistent quality and yield every time, when the exact procedures, equipment, and ingredients are used. Recipes must be updated to reflect current practices and products. Standardized recipes exist but do not accurately reflect what is happening in the kitchen. Use the resources on the Standardized Recipes webpage, including a checklist for pieces of information needed to standardize a recipe; tools to help analyze the meal component contribution; nutrient analysis tools; and templates to organize all information once obtained

(http://dpi.wi.gov/schoolnutrition/national-school-lunch-program/menu-planning/recipes, https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/recipe-template-one.doc). The PHN also encourages viewing the webcast, What's the Yield with Standardized Recipes?, which guides the viewer through the recipe standardization process (http://dpi.wi.gov/school-nutrition/training/webcasts#sr). Recipes for Homestyle Spaghetti and Meat Sauce and All American Chicken Wrap are not standardized to the operation.

Crediting Discrepancies

Crediting information recorded on the production records was not consistently in agreement with crediting information on the supporting documentation, such as Child Nutrition (CN) labels, product

formulation statements (PFS), standardized recipes, or the USDA *Food Buying Guide* for School Meal Programs (FBG). Including meal pattern contributions for specified grade groups on production records is not required, though it must be documented and available.

The following discrepancies were identified in crediting documentation from the review period:

- Raspberry sherbet cup (1 each) does not credit
- Campbell's Tomato Soup (1 cup serving) 3/4 cup of red/orange vegetable
- Giant Goldfish Grahams Cinnamon (0.9 oz each) 1 ounce equivalent (oz eq) of grain
- All American Chicken Wrap Chicken Patties (2.65 oz each) 1.5 oz eq meat/meat alternate (m/ma), 0.75 oz eq of grain
- Shredded lettuce (1/8 cup) does not credit
- Catallia 6" 100% Whole Wheat Pressed Flour Tortilla (28 grams each) 1 oz eq of grain

According to the FBG entry for Applesauce, canned, Smooth or Chunky, one Number (No.) 10 can of applesauce yields 47.60 one-quarter cup servings, about 12 cups of applesauce. Using this information, 1/2 cup serving of applesauce weighs 4.5 ounces.

Whole Grain-Rich Requirement

Foods that meet the whole grain-rich (WGR) criteria for the school meal programs contain at least 50 percent whole grain. The remaining 50 percent or less of grains, if any, must be enriched. Grains that are not whole grain-rich cannot be credited toward the grain component. Sara Lee White Made with Whole Grain bread is not WGR. USDA has a very thorough Whole Grain Resource that provides tools and tips for identifying whole grain-rich products

(http://www.fns.usda.gov/sites/default/files/WholeGrainResource.pdf).

The terms "wheat" or "made with whole grains" on a product label do not necessarily mean that a product is WGR. Always check the ingredient list to confirm the first ingredient is a whole grain (and any other grain ingredients in the list are enriched, if not whole. Alternatively, crediting documentation in the form of a product formulation statement may show that the combined weight of multiple whole grain ingredients exceeds the weight of the enriched grain ingredients.

Offer versus Serve

Ensure menu items are offered to students using language consistent with proper implementation of Offer versus Serve (OVS). During lunch meal observation on Thursday, February 21, as students declined applesauce cups, they were told they must take green beans. However, mashed potatoes were also available to meet the requirement of 1/2 cup of fruit, vegetable, or combination as part of reimbursable meals. Furthermore, students were reminded to select milk even when their trays contained 1/2 cup of fruit, vegetable, or combination and two other full components.

The Offer Versus Serve Guidance manual and the Offer Versus Serve webcast may be used as training resources (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/offer-versus-serve-guidance-manual.pdf, https://dpi.wi.gov/school-nutrition/training/webcasts). Additionally, Meal or No Meal, a training resource inspired by a game show, may be used for staff determining reimbursable meals (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/ovs-meal-or-no-meal-2018.pptx). Practice OVS in the context of St. John's Lutheran School's planned menu.

Portioning and Crediting Fruits and Vegetables

Most fruits and vegetables credit by volume served (e.g. ½ cup peaches, drained will credit ½ cup fruit) and the FBG will note if the crediting is different based on volume served (e.g. one medium banana credits ½ cup fruit). Reference the School Nutrition Team (SNT) <u>Half-Cup Crediting of Fruits and Vegetables</u> <u>Handout</u> for amounts required to credit as 1/2 cup as well as suggested serving sizes

(https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/half-cup-fruit-veg.pdf). If the product is not listed in the FBG, additional crediting documentation is required.

According to The School Day Just Got Healthier Fact Sheet: Calories in School Meals (https://fns-prod.azureedge.net/sites/default/files/HHFKAfactsheet-calories.pdf), there are not specific maximums on fruits or vegetables. Schools may allow greater amounts than the required minimums by offering self-service or allowing seconds servings of these components. Additional offerings do count towards the weekly calories limits, but because fruits and vegetables are generally lower in calories, they can be excellent sources for satisfying meals and sustained energy.

Corrective Action

Meal Pattern Finding #1: Recipes for Homestyle Spaghetti and Meat Sauce and All American Chicken Wrap are not standardized to the operation.

Required Corrective Action: Submit standardized recipes for these menu items, including weights or measures for all ingredients, serving size for single portion(s), total number of portions, and total yield (weight or measure [volume]). Meal component contributions will be evaluated against daily and weekly requirements.

Meal Pattern Finding #2: Sara Lee White Made with Whole Grain bread is not a whole grain-rich product. Required Corrective Action: Discontinue serving this item. Submit crediting documentation (e.g. complete nutrition facts label with ingredient statement, PFS) a for replacement product.

Meal Pattern Finding #3: Production records submitted for lunch for the review period were not filled in completely. All required information on the template, including planned # of servings, total planned quantity (in purchase units), and actual number of servings prepared, must be documented for all menu items.

Required Corrective Action: Submit three days of completed production records for lunch. Select production records you are confident are filled in accurately and completely

3. RESOURCE MANAGEMENT

Nonprofit School Food Service Account

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Annual Financial Report (AFR)

• When a student deposits funds in their lunch account which will be used for meal purchases, the amount received is not treated as revenue until the meal has actually been served to the student. The amount of funds on hand in student accounts is treated as a deposit or liability account in either the foodservice fund (Fund 50) or the general fund (Fund 10) until the meal is served, at which point the deposit account is converted to revenue. This amount should not be recorded as revenue or part of the fund balance on your Annual Financial Report.

Allowable Costs

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- Allowable costs are defined in 2 CFR 200 Subpart E and should be necessary, reasonable and allocable. More information on allowable costs can be found within the Indirect Costs guidance (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial).

Unpaid Meal Charge Policy

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs to

have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the <u>Unpaid Meal Charges In a "Nutshell"</u> (http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf). For a more comprehensive overview, see SP 23-2017: <u>Unpaid Meal Charges Guidance</u> https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-23-2017.pdf

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script
- Funds in student meal accounts are considered a liability until a meal is purchased. When the funds are left "unclaimed", they cannot be used to offset another student's negative account, unless *paid* households have *chosen to donate* those funds to the school food service account. All funds left in any student meal account which cannot be contacted must be turned over to the Wisconsin Department of Revenue (DOR) as unclaimed property. The DOR has rules concerning <u>unclaimed property</u> that must be followed (https://www.revenue.wi.gov/DOR%20Publications/pb82.pdf).

Findings and Corrective Action Needed: Nonprofit School Food Service Account

Finding #1: Annual Financial Report does not have any revenues or expenses allocated to nonprogram foods and the SFA sells adult meals and cold lunch milk.
Corrective Action Needed: Please provide a statement going forward that all nonprogram food expenses and revenues will be broken out from NSLP and allocated to the nonprogram foods line on the annual financial report. We have a <u>resource</u> on our website to aid you in this calculation (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/exceptions-nonprogram-revenue.pdf).

4. GENERAL PROGRAM COMPLIANCE

Civil Rights

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Nondiscrimination Statement

- When including the <u>non-discrimination statement</u> it is necessary to use the current statement (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/civil-rights).
 However, when space is very limited, such as on the printed menus, the abbreviated statement may be used, "This institution is an equal opportunity provider." The statement format cannot be altered and the font must be the same size font as the main text in the document.
- Some examples of informational materials that require the Nondiscrimination Statement:
 - School websites
 - Letters pertaining to the food service program
 - Menus
 - Advertisements
 - Parent/student handbook
 - Employee/volunteer handbook
 - Newsletters

Special Dietary Needs

Meals served to students with special dietary needs with the signed medical statement do not need to
meet meal pattern requirements. SFAs may use the <u>prototype Medical Statement</u> for Special Dietary
Needs posted on the DPI website, which is also available in Spanish and Hmong

(http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). Additional information on <u>special dietary needs</u> can be found on the DPI School Nutrition Team website (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs). This <u>flow chart</u> gives guidance on special dietary needs, as well. (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sdn-flowchart.pdf)

- School food service staff may make food substitutions, at their discretion, to accommodate children
 without a signed medical statement from a licensed medical practitioner. These accommodations
 made for students must meet the USDA meal pattern requirements in order for the meals to be
 reimbursable. It is recommended that the SFA develop a policy for handling these types of
 accommodations to ensure that requests are equitable for everyone.
- Juice may not be substituted for fluid milk unless juice is specified as a substitution on a medical statement signed by a licensed medical practitioner. Water is available to all students, but an SFA may choose to offer lactose free milk or provide a fluid milk substitute that meets the nutritional requirements set forth by USDA. Nutrition information for a fluid milk substitute the SFA wishes to provide for students, must be approved by the SNT office. For more information on <u>fluid milk substitutes</u>, please see our Special Dietary Needs webpage (http://dpi.wi.gov/school-nutrition/national-school-lunch-program/special-dietary-needs).

Local Wellness Policy

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act (HHFKA) of 2010. The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-17 with full compliance of the final rule by June 30, 2017.

Resources:

- Please refer to the USDA <u>summary of the requirements</u> for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf).
- USDA Food and Nutrition Service has information on the <u>local school wellness policy</u> process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several <u>wellness policy resources</u> available, including a toolkit, a
 wellness policy builder, and wellness policy report card (http://dpi.wi.gov/schoolnutrition/wellness-policy).

Findings and Corrective Action Needed: Local Wellness Policy

- ☐ **Finding #2:** SFA has a good LWP but is missing two requirements.
 - 1. <u>School Meal Regulations</u>: SFAs are required to adhere to USDA meal regulations and include language related to this in the written policy such as; *all meals meet or exceed nutrition requirements established under the Healthy Hunger-free Kids Act of 2010.*
 - 2. <u>Food and Beverage Marketing</u>: SFAs may only market products that adhere to Smart Snacks guidelines during the school day and are required to include language related to this in the written policy such as; all food or beverage products marketed to students and/or depicted on items/equipment on the school campus, during the school day, must meet Smart Snacks nutrition standards.

Corrective Action Required: Please provide a timeline for updating your policy to become compliant with the final rule.

Smart Snacks in Schools

At the time of the on-site review there were no competitive foods or beverages sold at St. John's Lutheran School. If any food or beverage sales occur in the future, the items must either be in compliance with the Smart Snacks general and nutritional guidelines, or must qualify as an exempt fundraiser. A staff member at each school should be responsible for documenting compliance of exempt fundraisers and any other competitive food sales. You can find fundraiser tracking tools on our Smart Snacks webpage (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks).

Professional Standards

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

- Thank you for completing your required training hours and for having all staff associated with the meals program complete the USDA civil rights training.
- It is recommended that anyone involved in the point of service complete Offer Vs. Serve training. Please see the Meal Pattern and Nutritional Quality section for links to our OVS webcasts.

Food Safety and Storage

Commendations/Comments/Technical Assistance (TA)/Compliance Reminders

Food Safety Plans

- The Food Safety Plan was available for review. It was obvious in observing the food service staff at work that they are very knowledgeable about food safety practices and safe food handling. All temperature logs, calibration logs, and sanitizing solution logs were up-to-date.
- The site-specific food safety plan should include SOPs for all programs and procedures utilized at the site. Please remove any SOPs that are not specific to the site.

Food Employee Reporting Agreements

- All food service employees must have a signed <u>Food Employee Reporting Agreement</u> on file (https://datcp.wi.gov/Documents/foodemployeereportingagreementsupplement.pdf).
- It is best practice to have all staff associated with meal prep or service sign the Food Employee Reporting Agreement. At a minimum, all staff should be trained on signs and symptoms of foodborne illness.

Findings and Corrective Action: Food Safety

☐ **Finding #3:** Missing <u>SOP</u> for Use of Milk Barrels (https://dpi.wi.gov/school-nutrition/food-safety). **Corrective Action Needed**: Submit a copy of the SOP you will use for Use of Milk Barrels.

Buy American

If no country of origin is identified on label, and country of origin cannot be located on the distributor's online catalog or website, then the SFA must get certification from distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S." This can accepted within an email. Alternatively, consider the Contractor (https://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/buy-american-attestation.docx). By signing this Attestation, the Contractor is attesting that the agricultural product(s) listed are compliant with the Buy American Provision as defined in 7 CFR Part 210.21(d).

The label should indicate if the product is grown, processed, and packed in the continental U.S. and any U.S. Territories. If the label indicates that product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above. For more information, visit the Buy American Provision webpage (https://dpi.wi.gov/school-nutrition/procurement/buy-american).

Finding: The following products were identified in SFA's storage area as non-domestic and not listed on the SFA's Buy American Non-Compliant Product List:

- Oats from Canada, USA
- Dehydrated garlic from China
- Granulated garlic from China

Required Corrective Action: Update the SFA's Non-Compliant Product List to include any noncompliant products listed above. Provide copies of the updated forms.

Summer Food Service Program (SFSP) Outreach

Summer Meals

Thank you for informing families of summer meals locations to ensure students have access to healthy meals year round.

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career. Her goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI <u>Every Child a Graduate</u> webpage (https://dpi.wi.gov/statesupt/every-child-graduate)."



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